

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEANNE MARIE CRISP,

Defendant.

NO: 2:15-CR-9-RMP

PROTECTIVE ORDER

Before the Court is the Government's Motion for Protective Order, **ECF No. 20**, and Motion to Expedite, **ECF No. 21**. The Government seeks to limit the dissemination of discovery materials, which contain sensitive personal information. Defendant has not responded.

The Court has reviewed the proposed protective order and finds good cause to enter it so that Defendant may receive discovery materials as expeditiously as possible.

/ / /

1 Accordingly, **IT IS HEREBY ORDERED:**

2 1. The Government's Motion for Protective Order Regulating Disclosure  
3 of Discovery and Sensitive Information, **ECF No. 20**, and the Motion to Expedite,  
4 **ECF No. 21**, are **GRANTED** to the extent provided herein.

5 2. The Government has disclosed and shall disclose the discovery and  
6 sensitive information materials (herein "Discovery") in its possession pursuant to  
7 the discovery obligations imposed by this Court.

8 3. Government personnel and counsel for Defendant shall not provide, or  
9 make available, the sensitive information in the Discovery to any person except as  
10 specified in this Order or by approval from the Court. Defense counsel and the  
11 Government shall restrict access to the Discovery and shall disclose the sensitive  
12 information in the Discovery only to their client, office staff, investigators,  
13 independent paralegals, necessary third-party vendors, consultants, and/or  
14 anticipated fact or expert witnesses to the extent that defense counsel believes is  
15 necessary to assist in the defense of their client in this matter or that the  
16 Government believes is necessary in the investigation and prosecution of this  
17 matter.

18 4. Third parties contracted by the United States or defense counsel to  
19 provide expert analysis or testimony may possess and inspect the sensitive  
20 information in the Discovery, but only as necessary to perform their case-related

1 duties or responsibilities in this matter. At all times, third parties shall be subject  
2 to the terms of the Order.

3 5. Discovery in this matter has been and will be made available to  
4 defense counsel on compact discs ("CDs"). In order to provide discovery to the  
5 client, defense counsel may duplicate the CDs only once. No other copies of the  
6 CDs shall be made, by defense counsel or Defendant, without prior approval from  
7 the Court. Copies may be made to computer devices for the purpose of review and  
8 use of discovery at court proceedings in this matter, provided that such computer-  
9 generated copies containing sensitive information are destroyed at the case  
10 conclusion or withdrawal/termination of counsel, whichever occurs first.

11 6. To the extent that defense counsel makes any portion of the Discovery  
12 available in paper format to anyone, including the client, outside of counsel's  
13 office, defense counsel shall ensure that any and all sensitive information is  
14 redacted or removed and that it will not be susceptible to misuse or abuse. Such  
15 redactions/removal shall include, but shall not be limited to, the following: (a) all  
16 Social Security numbers or taxpayer identification numbers; (b) all employer  
17 names, locations, addresses, as well as salary information; (c) all residential and  
18 business addresses; (d) all telephone numbers and email addresses; (e) all lease,  
19 bill, and contract payment amounts; (f) all dates of birth; and (h) all information  
20

1 identifying the contents and account number of any financial account, including  
2 bank account(s).

3       7. All counsel of record in this matter, including counsel for the  
4 Government, shall ensure that any party, including Defendant, that obtains access  
5 to the Discovery is provided a copy of this Order. No other party that obtains  
6 access to or possession of the Discovery containing sensitive information shall  
7 retain such access or possession unless authorized by this Order, nor further  
8 disseminate such Discovery except as authorized by this Order or by the further  
9 Order of this Court. Any other party that obtains access to or possession of the  
10 Discovery containing sensitive information, once the other party no longer  
11 requires access to or possession of such Discovery, shall promptly destroy or  
12 return the Discovery once access to Discovery is no longer necessary. For  
13 purposes of this Order, “other party” is any person other than counsel for the  
14 Government, counsel for Defendant, or Defendant.

15       8. All counsel of record, including counsel for the Government, shall  
16 keep a list of the identity of each person to whom the Discovery containing  
17 sensitive information is disclosed and who was advised of the requirements of this  
18 Order. Neither counsel for Defendant nor counsel for the Government shall be  
19 required to disclose this list of persons unless ordered to do so by the Court.  
20

